

EXHIBIT B

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

DR. GEORGE RICHARDSON, ROSALIE §
WEISFELD, AUSTIN JUSTICE §
COALITION, COALITION OF TEXANS §
WITH DISABILITIES, MOVE TEXAS §
CIVIC FUND, LEAGUE OF WOMEN §
VOTERS OF TEXAS, §

Plaintiffs §

v. §

Civil Case No. 5:19-cv-00963

TEXAS SECRETARY OF STATE, TRUDY §
HANCOCK, in her official capacity as §
BRAZOS COUNTY ELECTIONS §
ADMINISTRATOR, and PERLA LARA in §
her official capacity as CITY OF MCALLEN, §
TEXAS SECRETARY, §

Defendants. §

**DECLARATION OF HANI MIRZA IN SUPPORT OF PLAINTIFFS' RESPONSE TO
THE COURT'S ORDER TO SHOW CAUSE**

I, Hani Mirza, declare, pursuant to 28 U.S.C. § 1746, that:

1. I am a practicing attorney at the Texas Civil Rights Project, a 501(c)(3) organization.
2. Along with my colleagues at the Texas Civil Rights Project and co-counsel at Willkie Farr & Gallagher LLP, I represent Plaintiffs in this case.
3. As counsel in this case, I rely on ECF notifications through email to provide notification of entries on the docket.
4. On June 20, 2023, when the Court issued a docket-entry order requiring Plaintiffs to file an amended complaint within twenty days of its order, I did not receive an ECF notification via email.
5. To my knowledge, none of the attorneys representing Plaintiffs received an ECF notification via email about the Court's order in this case on June 20, 2023.

6. Accordingly, Plaintiffs and their counsel missed the Court's deadline.
7. On July 20, 2023, when the Court entered its Order to Show Cause, I did not receive an ECF notification via email.
8. I learned for the first time about the Court's Order to Show Cause when an attorney at Willkie Farr & Gallagher LLP, who to my knowledge departed from Willkie Farr & Gallagher on July 28, 2023, accessed the docket manually on July 25, 2023, and then notified our team of the Court's latest entries on the docket in this case.
9. On July 26, 2023, I called courtroom deputy Sylvia Ann Fernandez to let the Court know that Plaintiffs' counsel were not receiving ECF notifications for this case.
10. Later that day, I received an ECF notification via email for the Court's July 20, 2023 Order to Show Cause. *See Ex. C.*
11. I called Ms. Fernandez that day to let her know that Plaintiffs' counsel just received the July 20th show cause order.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 3rd day of August 2023.

Respectfully submitted,



Declarant – Hani Mirza